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11 *Attorneys for Defendant*
12 *Bunga Bunga LLC*

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 LUIS PONCE, an individual, and ON
16 BEHALF OF OTHERS SIMILARLY
17 SITUATED,

Case No. 2:19-cv-02002-KJD-VCF

18 Plaintiffs,

**STIPULATION TO EXTEND
DEADLINE FOR DEFENDANT TO
RESPOND TO PLAINTIFFS'
COMPLAINT**

19 vs.
20 BUNGA BUNGA LLC, a domestic limited-
21 liability company,

(SECOND REQUEST)

22 Defendant.

23 IT IS HEREBY STIPULATED by and between Plaintiff Luis Ponce ("Plaintiff"), through
24 his counsel Lagomarsino Law, and Defendant Bunga Bunga LLC ("Defendant"), through its
25 counsel Jackson Lewis P.C., that Defendant shall have up to and including Thursday, February
26 13, 2020, in which to file a response to Plaintiff's Complaint. This Stipulation is submitted and
27 based upon the following:

- 28 1. Defendant's response to the Complaint is currently due on January 13, 2019.
2. In the interest of avoiding litigation and unnecessary expenditure of resources, the
25 parties have elected to evaluate the potential for settlement of the claims alleged in the Complaint.
3. This is the second request for an extension of time for Defendant to file a response
27 to Plaintiff's Complaint.
4. This request is made in good faith and not for the purpose of delay.

1 5. Nothing in this Stipulation, nor the fact of entering into the same, shall be
2 construed as waiving any claim and/or defense held by any party.

3 Dated this 6th day of January, 2020.

4 LAGOMARSINO LAW

5 *s/ Andre M. Lagomarsino*
6 Andre M. Lagomarsino, Bar No. 6711
7 3005 W. Horizon Ridge Pkwy., Suite 241
Henderson, Nevada 89052

8 Attorney for Plaintiff

JACKSON LEWIS P.C.

s/ Daniel I. Aquino
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Attorneys for Defendant

10 **ORDER**

11 IT IS SO ORDERED:



12 United States Magistrate Judge

13 1-7-2020

14 Dated: _____